



FACILITY COMPLIANCE AUDIT REPORT

Division of Waste Management Solid Waste Section

| UNIT TYPE: | | | | | | | | | | | | |
|-------------------|-------------------------------------|-----------------------|--|---------------|--|---------------------|--|---------|-------------------------------------|------|--|---|
| Lined MSWLF | | LCID | | YW | | Transfer | | Compost | | SLAS | | COUNTY: Guilford PERMIT NO.: 41-17 FILE TYPE: COMPLIANCE |
| Closed MSWLF | | HHW | | White goods | | Incineration | | T&P | <input checked="" type="checkbox"/> | FIRM | | |
| CDFL | <input checked="" type="checkbox"/> | Tire T&P / Collection | | Tire Monofill | | Industrial Landfill | | DEMO | | SDTF | | |

Date of Audit: 04/24/09

Date of Last Audit: NA – Initial Inspection

FACILITY NAME AND ADDRESS:

A-1 Sandrock, Inc.
 2901 Bishop Road
 Greensboro, North Carolina, 27406

GPS COORDINATES: N: 35.99210 E: 79.84738

FACILITY CONTACT NAME AND PHONE NUMBER:

Ronnie E. Petty III
 Office: 336-855-8195
 Cell: 336-736-2104
 Mike McFeeley
 Cell: 336-301-8411
 e-mail: alsandrock@bellsouth.net

FACILITY CONTACT ADDRESS:

A-1 Sandrock, Inc.
 2901 Bishop Road
 Greensboro, North Carolina, 27406

AUDIT PARTICIPANTS:

Ronnie Petty, A-1 Sandrock
 Mike McFeeley, A-1 Sandrock
 Hugh Jernigan, North Carolina Solid Waste Section

STATUS OF PERMIT:

Original Permit to Construct, Phase 1 Issued: February 7, 2004
 Permit to Construct Modification Issued: June 1, 2006
 Permit to Operate Phase 1, Cell A Issued: April 17, 2009
 Permit Expires: November 6, 2013

PURPOSE OF AUDIT:

Comprehensive Audit/Initial inspection

NOTICE OF VIOLATION(S):

NONE

You are hereby advised that, pursuant to N.C.G.S. 130A-22, an administrative penalty of up to \$15,000 per day may be assessed for each violation of the Solid Waste Statute or Regulations. For the violation(s) noted here, you may be subject to enforcement actions including penalties, injunction from operation of a solid waste management facility or a solid waste collection service and any such further relief as may be necessary to achieve compliance with the North Carolina Solid Waste Management Act and Rules.

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STATUS OF PAST NOTED VIOLATIONS:

NONE

AREAS OF CONCERN AND COMMENTS:

1. The facility is a Construction and Demolition Landfill and Treatment and Processing facility.
2. The Permit to Operate was issued on April 17, 2009 for Phase 1, Cell A (2.54 acres) of the Construction and Demolition Landfill, and for the Treatment and Processing operations.
3. The facility began receiving waste on April 20, 2009.
4. Conducted a review of the conditions of the Permit to Operate, Franchise Agreement, Facility Operational Records, and Facility Operations Plan.
5. The facility is approved to accept up to 300 tons per day or 84,000 tons per year based on 5.5 day working week and 52 weeks per year.
6. The Construction and Demolition Landfill is regulated by 15A NCAC 13B, .0531-.0547 for current operations and all future landfill cell construction.
7. A recycling process to reclaim at least ten percent (10%) of the waste received must be implemented by the facility in accordance with the approved franchise agreement (dated November 6, 2003 and amended March 17, 2009) with Guilford County.
8. **The Treatment and Processing operation is approved for a six (6) month demonstration period (until October 20, 2009). The Permittee shall submit a report to the Solid Waste Section on the operation of the demonstration within 20 days of the completion of the 6 month demonstration, including suggested or necessary changes. The Section will review the report and extend the demonstration, approve the operation, or terminate approval.**
9. **A modification of the Permit to Construct, issued June 1, 2006 will be required prior to construction of the Phase 1, Cell B and Cell C areas.**
10. The facility is permitted to receive waste generated in counties within a fifty (50) mile radius of the site as approved in the franchise agreement with Guilford County, including Alamance, Cabarrus, Caswell, Chatham, Davidson, Davie, Durham, Forsyth, Guilford, Lee, Montgomery, Moore, Orange, Person, Randolph, Rockingham, Rowan, Stanly, Stokes, Surry, and Yadkin counties.
11. The Permit has been recorded with the Guilford County Register of Deeds and submitted to the Solid Waste Section, as required under Attachment 1, Part IV, General Permit Conditions, Item 3 of the Permit to Operate.
12. Financial Assurance documentation has been submitted and approved by the Solid Waste Section.
13. All facility records are to be maintained and available for review at the site.
14. Reviewed operator training records for the facility. The following have approved SWANA certifications: Mike McFeeley, Certified Landfill Manager, expires 02/22/11; Ronald Petty, Certified Landfill Operations Specialist, expires 12/06/09; and George Sudderth, Certified Landfill Operations Specialist, expires 02/13/09.
15. The facility has an approved NPDES Storm Water permit, and has recently been inspected by the Division of Water Quality.
16. The facility has an active mining permit (North Carolina Mining Permit 41-22) issued by Land Quality.
17. Reviewed the Surface Water/Ground Water/Landfill Gas monitoring program (5 ground water monitoring wells, 4 surface water monitoring locations and 7 landfill gas probes). The initial baseline monitoring for the facility has been conducted and the first semiannual sampling event has been scheduled.
18. Reviewed random inspection/waste screening program. A minimum of three random inspections of incoming waste are to be conducted weekly.
19. As per the approved Operations Plan, the facility is to maintain and document activities on an Operation and Maintenance (O&M) Checklist. Documentation of daily, weekly, monthly, and semi-annual action items as listed in the approved Operational Plan are to be included on the O&M Checklist.
20. Observed Construction and Demolition Landfill operations and Treatment and Processing operations.
21. Proper signage for the facility was observed.
22. Windblown materials have been effectively controlled and collected.

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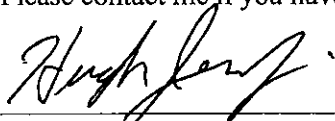
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23. Adequate all weather roads have been constructed for ingress and egress at the facility. The facility is planning to purchase a water truck for dust control.
24. Edge of waste boundary markers are in place for the Phase 1, Cell A landfill area. Edge of waste boundary markers are to be maintained at all times for all landfill areas permitted to receive waste.
25. Sedimentation basins in place, and maintained with adequate retention space. No on-site or off-site erosion observed.
26. Observed facility monitoring wells. **Note: All monitoring well are to be locked at all times, excepting scheduled sampling events.**
27. The working face of the C&D Landfill was small and well compacted. The facility has recently commenced operations, so there was a minimal amount of waste disposed in the landfill.
28. Active sorting of recyclables was being conducted on the C&D Landfill during the inspection of the facility.
29. Materials currently being separated and processed include wood products (for boiler fuel and mulch), earthen inert materials (rock, stone, concrete... for processing into aggregate), metals, cardboard, and vinyl siding.
30. The Treatment and Processing operations are separated into C&D and LCID components.
31. Processing (tipping, sorting, loading of recyclables) from incoming C&D waste is to be conducted near the working face of the C&D Landfill at a minimum of 50 feet from the working face. The Treatment and Processing of C&D waste and collected recyclable materials are being stored in containers or stockpiled as per the approved Operations Plan.
32. Incoming LCID waste is stockpiled in a separate area inside the footprint of the C&D Landfill facility prior to shredding or grinding into boiler fuel, mulch, or aggregate. **Note: Acceptable LCID waste does not include "Yard Trash" which is defined as solid waste resulting form landscaping and yard maintenance such as brush, grass, leaves, tree limbs, and similar vegetative materials.** This type of waste typically has a high nitrogen content and could result in elevated temperatures, composting of materials, and potential fires in vegetative storage piles. Care should be taken to prevent the acceptance of any yard trash waste.
33. LCID materials are not to be combined with other materials prior to being processed. C&D and similar LCID materials may be combined for final processing (such as wood waste to be ground for boiler fuels and inert debris to be crushed for aggregate).
34. Discussions were held concerning waste acceptance in reference to wood pallets. Section 6.4.5 of the approved Facility Operations Plan states "Processing activities shall be limited to grinding, shredding, or chipping land clearing debris, unpainted wood waste (including pallets...)". The legislated wood pallet disposal ban, effective October 2009, refers to disposal of wood pallets in landfills and not acceptance of wood pallets for processing and recycling.
35. The LCID Treatment and Processing was being conducted as per the approved Operations Plan.

Please contact me if you have any questions or concerns regarding this audit report.



Hugh Jernigan

Environmental Senior Specialist

Regional Representative

Phone: 336-771-5093

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| Delivered on : 04/30/09 by | X | e-mail | | US Mail | | Certified No. [] |
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cc: Mark Poindexter, Field Operations Branch Supervisor
Jason Watkins, Central District Supervisor
Donald Herndon, Compliance Officer